

Anti-Fraud, Bribery & Corruption Policy

Action Plan 2011/12

Action for 2011/12	Responsibility and timescale
1. The Council's Code of Corporate Governance will be reviewed and publicised through a re-launch of the Council's counter crime policies.	Internal Audit Manager. 31/03/12
2. The Constitution, including the Code of Conduct for Employees, will be reviewed in light of the Bribery Act 2010.	Internal Audit Manager. 31/03/12
3. The Whistle-blowing Policy will be reviewed in light of the Bribery Act 2010.	Internal Audit Manager. 31/03/12
4. Regarding the Bribery Act, a risk assessment will be undertaken, based on the 6 principles of proportionality, top-level commitment, risk assessment, due diligence, communications and training, and monitoring and review.	Internal Audit Manager & Head of Governance 31/03/12
5. A range of communications channels to disseminate information covering all aspects of corporate anti-fraud and corruption will be developed and implemented, including: <ul style="list-style-type: none"> ○ Use of the intranet, ELSIE ○ Briefings on specific issues ○ Alerts on specific risks and fraudulent practices ○ Targeted training sessions for employees and elected Members 	Internal Audit Manager 31/03/12
6. Elected Members, Management Team and senior managers to be briefed on their roles in setting the culture, raising awareness, increasing understanding and leading by example through the roll out of the Anti-Fraud, Bribery and Corruption Policy.	Internal Audit Manager. 31/03/12
7. Internal Audit will review the Anti-Fraud, Bribery & Corruption Policy annually in consultation with Management Team.	Internal Audit Manager.
8. A register to be introduced to record acts of soliciting or attempted bribery and the actions taken.	Head of Governance. 31/03/12